

1 Carl J. Oreskovich, WSBA #12779
2 Andrew M. Wagley, WSBA #50007
3 Etter, McMahon, Lamberson,
4 Van Wert & Oreskovich, P.C.
5 618 West Riverside Avenue, Suite 210
6 Spokane, WA 99201
7 (509) 747-9100
8 (509) 623-1439 Fax
9 Email: carl@ettermcmahon.com
10 Email: awagley@ettermcmahon.com
11 *Attorneys for Defendant Mary Ann Bliesner*

12
13 UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF WASHINGTON

15 UNITED STATES OF AMERICA,

16
17 Plaintiff,

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19 v.

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21 MARY ANN BLIESNER,
22 VALLEY PROCESSING, INC.,

23
24 Defendants.

Case No. 1:22-CR-2097-SAB

**DEFENDANT'S UNOPPOSED
MOTION TO CONTINUE
SENTENCING HEARING AND
ASSOCIATED FILING
DEADLINES AND REQUEST
FOR EXEPDITED
CONSIDERATION**

Without Oral Argument:

February 18, 2025, at 6:30 pm

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29 COMES NOW, Defendant Mary Ann Bliesner, by and through her
30 attorneys of record, Carl J. Oreskovich and Andrew M. Wagley of Etter,
31 McMahon, Lamberson, Van Wert & Oreskovich, P.C., and hereby moves this
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1 Court for a continuance of the currently scheduled Sentencing Hearing and all
2 associated filing deadlines. This Motion is based upon the files and records
3 contained in the Court File herein. Defendant further requests this Motion be
4 considered on an expedited basis based upon the current sentencing deadlines.
5 Defense Counsel's office has been in contact with Mrs. Bliesner who indicated
6 she has no objection to continuing the sentencing hearing. As indicated below,
7 this Motion is unopposed by Assistant United States Attorney (AUSA) Dan
8 Fruchter, Probation Officer, Jennifer Dykstra, and Co-Defendant Valley
9 Processing Inc., by and through its counsel of record.

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17 **MEMORANDUM OF LAW**
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19 In general, "[t]he court must impose sentencing without unnecessary
20 delay." Fed. R. Crim. P. 32(b)(1). However, "[t]he court may, for good cause,
21 change any time limits" for sentencing. Fed. R. Crim. P. 32(b)(2). For the
22 reasons indicated herein, good cause exists to grant this continuance request.
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26 In the situation at hand, Mrs. Bliesner respectfully requests a continuance
27 of the Sentencing Hearing currently scheduled for March 26, 2025, and all
28 associated filing deadlines, (including those related to the Draft Presentence
29 Investigation Report), for 30 to 60 days, depending on the Court's availability.
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1 This continuance is necessary as additional time is needed to schedule the
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3 Presentence Investigation Interview, gather sentencing materials (including
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5 letters of support), and to prepare for the Sentencing Hearing. The applicable
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7 parties have been delayed based upon the Holidays and various scheduling
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9 conflicts. Furthermore, Defense Counsel is unavailable for the Presentence
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11 Investigation Interview for a majority of this month based upon a preplanned
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13 vacation.

14 This is the first request for a continuance of the Sentencing Hearing in this
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16 matter. As indicated above, this Motion is unopposed by all involved parties.
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18 As such good cause exists to grant this continuance.

19 CONCLUSION

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21 Based upon the foregoing, Mrs. Bliesner respectfully requests that this
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23 Court grant this Unopposed Motion to Continue the Sentencing Hearing and
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25 Associated Filing Deadlines and reset Mrs. Bliesner's Sentencing Hearing out
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27 30 to 60 days. This request specifically includes the extension of all associated
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29 deadlines, including those related to the Draft Presentence Investigation Report.

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1 RESPECTFULLY SUBMITTED this 11th day of February, 2025.

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3 ETTER, McMAHON, LAMBERSON,
4 VAN WERT & ORESKOVICH, P.C.
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7 By: /s/ Andrew M. Wagley
8 Carl J. Oreskovich, WSBA #12779
9 Andrew M. Wagley, WSBA #50007
10 *Attorneys for Defendant Mary Ann Bliesner*
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CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2025, I electronically filed the forgoing document with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the attorneys of record.

EXECUTED in Spokane, Washington on February 11, 2025.

By: /s/ Jodi Dineen
Jodi Dineen, Paralegal